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June 12, 2012

BY ELECTRONIC FILING

Magistrate Judge Jacqueline Scott Corley
United States District Court
Northern District of California
450 Golden Gate Avenue
Courtroom F -- 15th Floor
San Francisco, CA 94102

RE: Liberty Mutual Insurance Co. v. The California Auto Assigned Risk Plan
(Case No. 3:11-cv-01419-MMC)

Dear Judge Corley:

I am lead counsel for Liberty Mutual Insurance Company in the above matter. Your Honor has scheduled a hearing on certain discovery disputes at 9:00 a.m. on Thursday, June 14. My partner, Amy S. Park, will attend the hearing in person. For the following reasons, I respectfully request permission to attend the hearing by telephone:

- A. Liberty Mutual is headquartered in Boston, Massachusetts, and has retained me, from my firm's Boston office, as lead counsel; Ms. Park and others from the firm are assisting me;
- B. The Court issued an Order on June 5, 2012 that required the parties to meet and confer regarding their discovery disputes. The Order also required the parties to submit an additional letter on or before June 12, 2012 highlighting any remaining disputes. (See Docket No. 48);

- C. The parties conferred regarding the outstanding discovery disputes on June 7 and 8, 2012, but were unable to resolve certain outstanding issues;
- D. In accordance with the Order, Liberty Mutual and defendant California Assigned Risk Automotive Plan will submit a letter highlighting the remaining disputes on June 12, 2012, and will attend the hearing scheduled for June 14, 2012;
- E. I respectfully request that I be permitted to participate in the hearing by telephone because of scheduling conflicts that prevent me from traveling to San Francisco for the hearing;
- F. My participation by telephone will not disrupt the hearing, particularly because Ms. Park will be present in person and will be prepared to present argument.

Respectfully,

James R. Carroll
James R. Carroll

cc: Counsel of Record

Counsel shall contact Court Call at 1-888-882-6878 to make arrangements to appear by phone.

Dated: 6/13/12

